REMARKS

Before this reply, Claims 1-34 were pending in the above-referenced patent application. Through this reply, new Claims 35-43 have been added. As such claims 1-43 are now pending in the patent application. Claims 3, 4, 11, 17, 21, 24, 25, 29 and 32 have been amended to further clarify the claimed limitations. The new claims, and amendments, are supported by the specification. No new matter has been added.

In the Office Action, Claims 1-34 were rejected. Specifically, Claims 17-34 were rejected under 35 U.S.C. 102(e) as being anticipated by USPN 6,289,405 to Movall et al. ("Movall"). Claims 1-12 and 16 were rejected under 35 U.S.C. 103(a) as being unpatentable over Movall in view of USPGPUB no. 2003/0011524 to Beard et al., ("Beard"). Claims 13-15 were rejected under 35 U.S.C. 103(a) as being unpatentable over Movall in view of Beard and further in view of USPGPUB no. 2002/0181633 to Trans. All of the rejections are traversed for at least the following reasons.

Claim rejections under 35 U.S.C. 102(e)

Rejection of claims 17-34 as being anticipated by Movall is respectfully traversed because, for at least the following reasons, Movall does not disclose all of the claimed limitations.

Movall is non-analogous art. Movall is directed to an electrical system having a chassis with slots for chassis electrical devices, and a connector board with a board slot for receiving a connector board electrical device. Movall provides a memory for storing vital product parametric data associated with the at least one chassis slot, the at least one connector board slot, and the respective electrical devices. The stored vital product parametric data can be accessed by the electrical system to check compatibility. (Abstract)

Movall is fundamentally different from a network backplane interface for a local network, according to the present invention. Movall is directed to compatibility check for devices in backplane of a computer, rather than providing a backplane that is a network interface for a local network of plug-in network devices. Movall does not provide a module and unified network backplane interface for a local network. Movall is oblivious to solving the problems addressed by the present invention

As per **Claim 17**, Movall does not disclose a network backplane interface for a local network, comprising a plurality of sockets for receiving plug-in network devices, as required by Claim 17. There is no teaching to suggestion in Movall that any plug-in network devices can even be connected to the backplane slots in Figs. 1A, 1B of Movall (relied on by the Examiner). Figs. 1A, 1B, simply illustrate a computer with a vital product parametric data system (Movall, col. 8, lines 7-9), and not a network backplane interface, as claimed. Further, in col. 10, line 49 (relied on by the Examiner), Movall is describing a potential incompatibility between an Ethernet controller and a slot on a first computer backplane because the first computer is having 'time out' problems in communicating with two older machines via the Ethernet card. The first computer's backplane is not a backplane interface for a local network of plug-in network devices, as claimed. Further, the "two older machines" in Movall are not plug-in network devices plugged into sockets in the first computer's backplane, rather the two older machines are connected to the first computer via the Ethernet card which is in a potentially incompatible slot in the backplane. In other words, the backplane in the first computer is not a network backplane interface for a local area network, to which backplane plug-in network devices are installed in sockets, a claimed. Further, the Examiner relies on Movall col. 8, line 27, lines 48-50, PCI slot connector DASD slot connector, and Fig. 1B. However, there is no disclosure in Movall that the slots can even receive plug-in network devices, as claimed.

Movall does not disclose power lines to one or more sockets for powering a plug-in

network device in each socket, as claimed. The Examiner interprets Movall, Fig. 1b, element 2; col. 12, lines 34-37 and col. 11, lines 1-3, as disclosing power lines to one or more sockets for powering a plug-in network device in each socket, as claimed. This interpretation is respectfully traversed. Element 2 in Fig. 1B simply a power supply, not power lines. In col. 12, lines 34-37, Movall simply describes a slot 21 for the power supply 2, without any mention or suggestion of power lines for slots that can receive network devices, as claimed. And, in co. 11, lines 1-3, Movall mentions different adapters and that connection parametrics are check for compatibility. There is no mention of power lines for slots that can receive network devices, as claimed. The Examiner must establish that each socket in Movall can receive a plug-in network device and has a power line connected there to. The Examiner has not established that.

Movall does not disclose communication lines to each socket for communication with the plug-in network devices, as claimed. Elements 19, 5, 15 in Fig. 1B of Movall are relied on by the Examiner to disclose the claimed limitations. This is respectfully traversed.
Element 19 is a host bus on the backplane 8, which Movall does not disclose bus 19 as communication lines to each socket for communication with the plug-in network devices.
Element 15 is a service processor card on backplane 7 which is not a communication line of any type, and Movall does not disclose element 15 as communication lines to each socket for communication with the plug-in network devices, as claimed. Element 5 in Movall is an I2C system bus, which Movall does not disclose element 15 as communication lines to each socket for communication with the plug-in network devices, as claimed.

The Examiner must not only establish that Movall discloses sockets that accept plug-in network devices, and power lines connected to those sockets, but also the Examiner must establish that in Movall each such also has a communication line connected there to. The Examiner has not done either. If the claims are once again rejected, Applicant respectfully requests that the Examiner clearly state what in Movall the Examiner considers to be sockets, power lines and

communication lines, as claimed.

Further, Movall (col. 8, line 57 to col. 9, lines 27; col. 12, lines 6-33), does not disclose a configuration module for functional configuration of one or more plug-in devices, wherein the configuration module communicates with each plug-in device in each socket to identify the plug-in device and configure the plug-in device for desired functions, as required by Claim 17. There is no identification process in Movall as claimed. There is no configuration module in Movall that identifies devices in slots. Rather, in Movall a device for a slot is identified and selected by an administrator before it is placed into the computer slot. In one example of the claimed invention, the configuration module comprises configuration software that allows a user to configure the network connected to the network interface backplane. As such, a network device is configured to perform desired functions, wherein the configuration steps affects function of the network device.

By contrast, Movall simply discloses checking compatibility between a computer backplane and additional devices to be added into the backplane slots. There is no disclosure in Movall of configuring network devices in sockets of a network interface backplane, to affect function of each network device to perform a desired function, using a configuration module on a backplane, as claimed. Indeed, in col. 8, line 57 to col. 9, lines 27, and col. 12, lines 6-33 (relied on by the Examiner), Movall states:

> The processor backplane 8 has the host bus, memory slots, one or more processor slots, etc., and implements the Operating System and System Management Applications shown in block diagram form as blocks 17 and 18. Hard-coded chassis, backplane, and/or device **parametrics may be stored in the operating system 17 for comparison with parametric data from and external source, such as a web site (not shown), or VPD parametric data stored in a plugged electrical device**. As is evident from the figure, each backplane 6, 7, 8 and 9, is provided with its respective VPD storage chip. The power supply 2, a socalled chassis device, is also provided with a VPD storage chip. Although not shown, advantageously, other electrical; devices (e.g., cooling fans, and peripherals) would have VPD memory the contents of which would be up-loaded to the operating system for access when needed by the system. The SPCN controller 3 interfaces with all of the VPD chips, and has thereon the chassis VPD chip 4 having chassis specific memory for storing chassis slot vital product data accessible by the computer operating system. The chassis

> specific memory could alternatively be provided at the computer system operator panel (not shown) or at the service processor 15, or another location associated with the chassis 1, as would be apparent to one skilled in the art. Through a bus 20, e.g., an RS485 serial bus, other SPCN nodes in other computer enclosures are interconnected. (Movall, col. 8, line 57 to col. 9, lines 27, emphasis added).
> In an ideal configuration, the chassis and all devices and backplanes in a system would carry parametric VPD according to the invention. **The chassis VPD would be compared with the backplane VPD, the chassis VPD would be compared with the device VPD, and the device VPD would be compared with the backplane device slot VPD to detect compatibility issues**. (Movall, col. 12, lines 6-33, emphasis added).

As is glaringly clear from the above passages, in Movall the parametrics include compatibility information about a computer slot for comparison with parametric data from an external source about a device to be added. These parametrics are not configuration information for configuring the function of a network device to perform a desired function, as claimed herein. Further, in Movall, no configuration of devices in slots is taking place based on the compatibility information in the VPD chips. As such, Movall simply discloses checking compatibility between a computer backplane and additional devices to be added into the computer slots. There is no disclosure in Movall about configuring network devices in sockets of a backplane, to affect function of each network device to perform a desired function. There is no disclosure in Movall about a configuration module on a network interface backplane, where in the configuration module enables configuring the function of each network devices in a socket on the backplane, such that the network device performs a desired function (e.g., performs network communication), as claimed. For at least these reasons, it is respectfully submitted that Claim 17 and all claims dependent therefrom should be allowed.

As per **Claim 18**, Movall does not disclose a memory for storing configuration instructions for configuring one or more different plug-in devices, as claimed. Movall, col. 12, line 24, relied on by the Examiner, simply mentions VPD chips having chassis specific memory for storing chassis slot vital product data for compatibility check, not information for configuration the function of a device. Further, Movall does not disclose a processor for executing the configuration

instructions to communicate with a plug-in device in a socket, and configure that device for network communication, as claimed. Movall, col. 12, lines 21-30, relied on by the Examiner, simply mentions that contents of VPD memory (i.e., product data for compatibility check) are up-loaded to an operating system which is used for compatibility check. Movall does not disclose VPD memory that stores configuration instructions. Movall does not mention a processor that executes such configuration instructions, or other instructions, and communicates with devices in backplane sockets to configure the function of those devices for network communication, as claimed. As discussed, Movall does not utilize configuration information of any kind from a backplane to perform functional configuration of devices. Movall simply uses information in VPD memory to check compatibility between backplane slot and a device to be inserted into the slot. For at least these reasons, it is respectfully submitted that Claim 18 should be allowed.

As per **Claim 19**, Movall does not disclose that the configuration module includes a configuration memory having configuration information for a plurality of predetermined plug-in device types, as claimed. As discussed, Movall (col. 12, line 24, or elsewhere) does not disclose a memory that stores configuration information that is used to configure the function of devices in backplane sockets. Further, in col. 13, lines 1-15 (relied on by the Examiner) Movall mentions how vital product parametric data for compatibility check is organized and stored in memory. There is no mention of configuration memory information in Movall which includes configuration information because, as discussed, compatibility/parametric information in Movall has nothing to do with configuration information in the present invention. Nor is there disclosure in Movall of configuration information in memory for a plurality of predetermined plug-in device types, as claimed. For at least these reasons, it is respectfully submitted that rejection of Claim 19 should be withdrawn.

As per **Claim 20**, Movall does not disclose the configuration module includes extended configuration memory for storing configuration information for additional device types, as

claimed. In col. 12, lines 10-15, relied on by the Examiner, Movall mentions that parametrics for a computer backplane may be stored in the computer operating system for comparison with parametric data from external sources. As such, in Movall the parametrics for compatibility check are stored in the operating system, and not extended memory, as claimed. Further, as discussed, Movall does not even disclose configuration information in a configuration memory. Further, in Movall there is no mention of any extended configuration memory for storing additional configuration information. For at least these reasons, it is respectfully submitted that rejection of Claim 20 should be withdrawn.

As per **Claim 21**, Movall does not disclose that the configuration module allows configuring plug-in devices in a configuration session for network communication among the plug-in devices, as claimed. As discussed, in col. 13, lines 39-45, relied on by the Examiner, Movall mentions VPD parametrics for compatibility check between backplane slots and devices to be inserted in the slots. The claimed limitations are patentably distinct from Movall since, as discussed, the claimed configuration module allows configuring the function of the plug-in devices in a configuration session. An example of configuring function of the plug-in devices is to affect function of those devices such that the devices communicate over the network. There is no such disclosure in Movall. For at least these reasons, it is respectfully submitted that rejection of Claim 21 should be withdrawn.

As per **Claim 22**, Movall does not disclose that the configuration module configures all plug-in devices in one configuration session, as claimed. As discussed, in col. 13, lines 1-15 (relied on by the Examiner) Movall mentions how vital product parametric data for compatibility check is organized and stored in memory. There is no mention of configuring function of plug-in devices. There is no mention in Movall of a configuration module that configures functions of plug-in devices. There is mention in Movall of configuring all plug-in devices in a one configuration session. Compatibility/parametric information in Movall has nothing to do with

configuration information in the present invention. For at least these reasons, it is respectfully submitted that rejection of Claim 22 should be withdrawn.

As per **Claim 23**, Movall does not disclose that the configuration module comprises a platform-independent configuration software for configuring functions of plug-in devices. In col. 10, lines 35-44, relied on by the Examiner, Movall is simply describing a user with many computers wanting to upgrade them, who wonders about types of different devices in different slots and their power requirements. Movall then mentions that the user can execute a system management application to query the VPD slot that includes product data information to determine parametrics for slot type and power for the devices. However, this has nothing to do with a configuration module on a network interface backplane that comprises configuration software that configures function of devices in the backplane sockets. The system management application in Movall simply queries VPD information for slot type and power requirements. This application does not perform any configuration of devices. Certainly, Movall says nothing about this application being platform independent. The system management application is simply irrelevant to the claimed limitations. For at least these reasons, it is respectfully submitted that rejection of Claim 23 should be withdrawn.

As per **Claim 24**, Movall does not disclose that the configuration module provides a user interface for receiving user configuration commands. In col. 9, lines 15-18, relied on by the Examiner, Movall is simply describing a system administrator that may require an additional Ethernet card Device for a computer, and looks up the computer model and a potentially suitable Ethernet card. Then the computer slot capabilities are checked for compatibility with the target adapter. Movall further mentions that if the system administrator has a particular Ethernet card in hand and is about to do a concurrent maintenance action, a concurrent maintenance program (CM task) could ask for the Ethernet card part number to be input. The CM task could then initiate a

Web task to query the Ethernet card catalogue parametric data and also coincidentally have the CM task query the backplane slots and create a list of compatible slots.

As such, all Movall discloses is that a part number can be input for compatibility check with the untended computer slot. Inputting a part number in Movall has nothing to do with a configuration module, or a configuration module that provides a user interface for receiving user configuration commands to configure one or more plug-in devices to perform a desired function. There is mention in Movall of configuring plug-in devices to perform desired functions. For at least these reasons, it is respectfully submitted that rejection of Claim 24 should be withdrawn.

As per **Claim 25**, for at least the reasons provided in relation to Claim 17, Movall does not disclose a network interface module for a local network, comprising a plurality of sockets for receiving plug-in network devices, power lines to one or more sockets for powering a plug-in network device in each socket, a switch connected to each socket allowing communication with the plug-in network devices, and a configuration module for functional configuration of one or more plug-in devices, wherein the configuration module communicates with each plug-in device in each socket to identify the plug-in device and configure function of the plug-in device to perform desired functions, as required by Claim 25. Further, element 7 in Fig. 1B of Movall relied on by the Examiner, is not a switch connected to each socket allowing communication with the plug-in network devices, as claimed. Indeed, element 7 in Fig. 1B is just a PCI backplane, not a switch that allows communication with the plug-in network devices on a backplane, as claimed. For at least these reasons, it is respectfully submitted that rejection of Claim 25, and all claims dependent therefrom, should be withdrawn.

Claims 26-33 were rejected for essentially the same reasons as rejection of Claims 18-24. As such, it is respectfully submitted that rejection of Claims 26-33 should be withdrawn for at least the reasons provided above in relation to Claims 18-24.

Claim rejections under 35 U.S.C. 103(a)

Rejection of Claims 1-12 and 16 under 35 U.S.C. 103(a) as being unpatentable over Movall in view of Beard is respectfully traversed because for at least the reasons provided herein, the references, alone or in combination, do not disclose all of the claimed limitations.

As per independent **Claim** 1, the Examiner has relied on the same reasons as rejection of Claims 17 and 25 for the conclusion that Movall discloses all of the limitations in Claim 1, except for the housing. The Examiner's reasoning and conclusions are respectfully traversed. Indeed, for at least the reasons provided above in relation to Claims 17 and 25, it is respectfully submitted that Movall does not disclose a network backplane interface for a local network, comprising a circuit board, a plurality of sockets connected to the circuit board for receiving plug-in network devices, power lines on the circuit board to one or more sockets for powering a plug-in network device in each socket, and communication lines on the circuit board to each socket for communication with the plug-in network devices, as required by Claim 25.

Further, as the Examiner also states, Movall does not disclose a housing for the circuit board, power lines and communication lines, including openings for exposing said sockets. However, the Examiner interprets element 330 in Fig. 9 of Beard to disclose such limitations, and the Examiner has modified Movall using Beard to conclude that the combination discloses the claimed limitations. The rejection is respectfully traversed. Further, Applicant respectfully traverses the Examiner's statement that it is well known in the art of a housing with multiple openings for exposing sockets on backplane (further Applicant respectfully traverses the Examiner's reliance on Beard for such a conclusion -- Applicant respectfully requests that the Examiner produce a qualifying reference for the Examiner's statement of the claimed housing being well known in the art).

As in Movall, Beard is simply non-analogous art. Beard is directed to a synchronization manager for standardized synchronization of separate programs, wherein a PC card with a retractable antenna for use in interfacing between a communications device and a wireless network includes an interface card portion and an antenna portion, the interface card portion having a first end, and an opposite second end, the first end having an electrical interface compatible with the communications device, the second end having an opening for slidably receiving the antenna portion, the interface card portion being dimensioned to be inserted into the PC card slot of the communications device, the antenna portion being in electrical communication with the interface card portion and dimensioned to fit inside the interface card portion, the antenna portion being accessible through the opening in the interface card portion by a user, the antenna portion being configured to extend out of the cavity and retract into the cavity of the interface card portion such that when the antenna portion is retracted into the cavity the antenna portion is substantially contained inside the interface card portion. (Abstract)

Therefore, Beard has nothing to do with module and unified network backplane interface for local networks according to the present invention. Beard is not directed to solving the problems solved by the present invention. Indeed, neither Beard nor Movall are directed to, or even mention, providing a network interface backplane, that allows modular component plug-ins for different network functions, wherein a user can easily add/remove plug-in components. Nor do Beard and Movall address configuring plug-in devices, and essentially eliminating external cabling for the plug-ins other than that to external devices.

Further, Beard does not disclose a housing for a circuit board, power lines and communication lines, including openings for exposing said sockets. Beard simply shows a laptop computer with a PC card slot 330 (relied on by the Examiner), for inserting card into a laptop. Further, Beard does not show a backplane with multiple sockets and a housing with openings for exposing those sockets. A laptop computer with a card slot in Beard, and a network interface

backplane having a housing with openings for multiple plug-in network devices are unrelated.

It is well settled that in order for a modification or combination of the prior art to be valid, the prior art itself must suggest the modification or combination, "...invention cannot be found obvious unless there was some **explicit** teaching or suggestion in the art to motivate one of ordinary skill to combine elements so as to create the same invention." *Winner International Royalty Corp. v. Wang*, No. 96-2107, 48 USPQ.2d 1139, 1140 (D.C.D.C. 1998) (emphasis added). "The prior art **must provide** one of ordinary skill in the art the **motivation** to make the proposed molecular modifications needed to arrive at the claimed compound." *In re Jones*, 958 F.2d 347, 21 USPQ.2d 1941, 1944 (Fed. Cir. 1992) (emphasis added). No motivation or suggestion is provided in the references to combine them as the Examiner does.

Movall is directed to an electrical system having a chassis with slots for chassis electrical devices, and a connector board with a board slot for receiving a connector board electrical device. Movall provides a memory for storing vital product parametric data associated with the at least one chassis slot, the at least one connector board slot, and the respective electrical devices. The stored vital product parametric data can be accessed by the electrical system to check compatibility. There is no suggestion or motivation in Movall of having a housing with openings to access slots on a computer backplane. The computers in Movall are existing computers with slots and Movall provides a way of checking compatibility of the slots with devices to be inserted in them. Movall is not in any way concerned with cutting openings in the computer housings to provide access to the slots. Movall is not concerned with, or even mention, the problem of providing a network interface backplane, that allows modular component plug-ins for different network functions, wherein a user can easily add/remove plug-in components and essentially eliminating external cabling for the plug-ins, as in the present invention. Nor is Beard concerned with providing such a housing since Beard simply utilizes a laptop housing card slot for inserting a card. As such, one of ordinary skill in the at would not look to either reference, or to combine them, to solve the

problems addressed by the present invention.

Even if the combination is legally justified, the result does not disclose the claimed limitations. Even if the references are combined, the result is not a network interface backplane including a circuit board, sockets, power and communication lines, in a housing with openings for access to the sockets, as claimed. Even if Movall's computer has openings in its housings for access to the slots therein, such a computer is simply a computer with slot openings, and not a network backplane interface for a local network, comprising a circuit board, a plurality of sockets connected to the circuit board for receiving plug-in network devices, power lines on the circuit board to one or more sockets for powering a plug-in network device in each socket, communication lines on the circuit board to each socket for communication with the plug-in network devices, and a housing for the circuit board, power lines and communication lines, including openings for exposing said sockets, as claimed. A computer in Movall is not a network interface backplane as claimed. The Examiner attempts to modify Movall by Beard, not based on disclosure or suggestion in the references, but based on Examiner's lacking interpretation of the references in the nature and extent of the disclosures therein. The Examiner is improperly using "hindsight" and the teachings of Applicant's own claimed invention. The Examiner improperly attempts to modify Movall in an attempt to achieve Applicant's claimed invention. For at least these reasons, rejection of Claim 1 and all claims dependent therefrom should be withdrawn.

As per **Claim 2**, despite the Examiner's interpretation, it is respectfully submitted that Movall does not disclose that a network interface backplane includes a communication controller which allows communication between the plug-in devices, ad claimed. Element 8 in Fig. 1A of Movall, relied on by the Examiner, is a processor backplane, which Movall does not disclose as being, or including, a communication controller which allows communication between the devices in slots. If the claims are once again rejected, Applicant respectfully requests that the Examiner

specifically point to description of such disclosure in Movall. For at least these reasons, it is respectfully submitted that rejection of Claim 2 should be withdrawn.

As per **Claim 3**, despite the Examiner's interpretation, it is respectfully submitted that Movall does not disclose a network interface backplane comprising a configuration circuit on the circuit board which allows configuring function of one or more plug-in devices to perform desired functions, as claimed. As discussed above, the VPD in Movall (Figs. 1A, 1B, relied on by the Examiner), simply provide compatibility checking, and is not a configuration circuit, as claimed. Further, in col. 8, lines 29-34 (relied on by the Examiner), Movall describes that his invention enables compatibility checking between a computer connector (slot) and a candidate device intended to be plugged into that slot. This is done by comparing physical and electrical properties stored in the form of parametric data in memory (i.e., VPD--Vital Product Data) located on a backplane, chassis and/or candidate device. Compatibilities of these computer components are compared against each other and/or against an a priori knowledge of the computer system's configuration and capability.

Therefore, in Movall there is no configuration circuit on the circuit board which allows configuring function of one or more plug-in devices to perform desired functions, as claimed. All Movall teaches is using VPD's to check computer slot and candidate device compatibility. For at least these reasons, it is respectfully submitted that rejection of Claim 3 should be withdrawn.

As per **Claim 4**, despite the Examiner's interpretation, it is respectfully submitted that Movall does not disclose that the configuration circuit communicates with a plug-in device in a socket to identify the plug-in device and configure the plug-in device for network communication function, as claimed. In col. 9, lines 5-27 (relied on by the Examiner), there is no identification process in Movall as claimed. There is no configuration circuit in Movall that communicates with, and identifies, devices in slots. Rather, in col. 9, lines 5-27 Movall states that a device for a slot is

manually identified and selected by an administrator.

Further, in col. 10, lines 47-61 (relied on by the Examiner), Movall is describing a potential incompatibility between an Ethernet controller and a slot on a first computer backplane because the first computer is having 'time out' problems in communicating with two older machines via the Ethernet card. The first computer's backplane is not a backplane interface for a local network of plug-in network devices, as claimed. Further, the "two older machines" in Movall are not plug-in network devices plugged into sockets in the first computer's backplane, rather the two older machines are connected to the first computer via the Ethernet card which is in a potentially incompatible slot in the backplane. The administrator manually selects device for a computer slot manually and the VPD information is then used to check compatibility. Movall does not disclose that the configuration circuit communicates with a plug-in device in a socket to identify the plug-in device and configure the plug-in device for network communication function, as claimed. For at least these reasons, it is respectfully submitted that rejection of Claim 4 should be withdrawn.

As per **Claim 5**, for at least the reasons discussed above in relation to Claim 18, it is respectfully submitted that despite the Examiner's interpretation, Movall does not disclose that the configuration circuit comprises memory for storing configuration instructions for configuring one or more different plug-in devices, and processor for executing the configuration instructions to communicate with a plug-in device in a socket, and configure that device for network communication, as claimed. For at least these reasons, it is respectfully submitted that rejection of Claim 5 should be withdrawn.

As per **Claim 6**, for at least the reasons discussed above in relation to Claim 19, it is respectfully submitted that despite the Examiner's interpretation, Movall does not disclose that a configuration circuit includes a configuration memory having configuration information for a plurality of predetermined plug-in device types, as claimed. For at least these reasons, it is

respectfully submitted that rejection of Claim 6 should be withdrawn.

As per **Claim 7**, for at least the reasons discussed above in relation to Claim 20, it is respectfully submitted that despite the Examiner's interpretation, Movall does not disclose that the configuration circuit includes extended configuration memory for storing configuration information for additional device types. For at least these reasons, it is respectfully submitted that rejection of Claim 7 should be withdrawn.

As per **Claim 8**, for at least the reasons discussed above in relation to Claim 21, it is respectfully submitted that despite the Examiner's interpretation, Movall does not disclose that the configuration circuit includes an embedded configuration module to configure plug-in devices in a configuration session, as claimed. For at least these reasons, it is respectfully submitted that rejection of Claim 8 should be withdrawn.

As per **Claim 9**, for at least the reasons discussed above in relation to Claim 22, it is respectfully submitted that despite the Examiner's interpretation, Movall does not disclose that the configuration module configures all plug-in devices in one configuration session, as claimed. For at least these reasons, it is respectfully submitted that rejection of Claim 9 should be withdrawn.

As per **Claim 10**, for at least the reasons discussed above in relation to Claim 23, it is respectfully submitted that despite the Examiner's interpretation, Movall does not disclose that the configuration module comprises a platform-independent configuration software, as claimed. For at least these reasons, it is respectfully submitted that rejection of Claim 10 should be withdrawn.

As per **Claim 11**, for at least the reasons discussed above in relation to Claim 23, it is respectfully submitted that despite the Examiner's interpretation, Movall does not disclose that the configuration circuit provides a user interface for receiving user configuration commands to

configure function of one or more plug-in devices to perform a desired function, as claimed. For at least these reasons, it is respectfully submitted that rejection of Claim 11 should be withdrawn.

As per **Claim 12**, it is respectfully submitted that despite the Examiner's interpretation, Movall does not disclose that at least one socket is dedicated to connection and communication with an external network, as claimed. According to Movall, element 20 in fig. 1B (relied on by the Examiner), is a bus 20 wherein other SPCN nodes in other computer enclosures are interconnected. This is clearly not a socket on a network interface backplane that is dedicated to connection and communication with an external network. There is no such disclosure in Movall. For at least these reasons, it is respectfully submitted that rejection of Claim 12 should be withdrawn.

As per **Claim 16**, it is respectfully submitted that despite the Examiner's interpretation, Movall does not disclose that a socket comprises a proprietary connector combining power and data connections, as claimed. The PCI slot connector in Movall (relied on by the Examiner), is not a socket with a proprietary connector combining power and data connections. How does a PCI slot disclose such claimed limitations? Further, in col. 11, lines 1-3 (relied on by the Examiner), Movall is simply discussing physical connection parametrics being examined for compatibility. This does not disclose socket with a proprietary connector combining power and data connections, as claimed. For at least these reasons, it is respectfully submitted that rejection of Claim 16 should be withdrawn.

Rejection of **Claims 13-15** under 35 U.S.C. 103(a) as being unpatentable over Movall in view of Beard and further in view of Trans is respectfully traversed because the references, alone or in combination do not disclose the claimed limitations. As discussed above, Movall and Beard do not disclose the limitations of independent Claim 1 from which Claims 13-15 depend. As the Examiner also states, Movall and Beard do not disclose the limitations of Claims 13-15. However,

the Examiner states that such limitations are known in the prior art. Applicant respectfully traverses such statement and conclusion by the Examiner. The Examiner has not provided a qualifying references that discloses: a switch for connecting a security module between said socket for external connection, and the local network (Claim 13); or, backplane with a connection for bridging a security module between a socket for external connection, and the local network (Claim 14); or, a socket comprising a RJ-45 socket on a network interface backplane (Claim 15).

It is respectfully submitted that Trans, directed to means and method for a synchronous network communications system, is non-analogues art. Trans has nothing to do with the present invention. It is respectfully submitted that Trans does not disclose the claimed limitations in Claims 13-15. As per **Claim 13**, Trans Para. [0100], lines 17-18, relied on by the Examiner, mentions that controls enabled by the Clock transfer system also provide mechanisms for the unique security feature of a personalized electronic signature for each system node (Electronic Deterrence of Network Address (E-DNA)). However, this has nothing to do with a switch for connecting a security module between a socket for external connection, and the local network, as required by Claim 13. A unique security feature of a personalized electronic signature in Trans, is simply not a switch, or a switch for connecting a security module between a socket for external connection, and the local network, as claimed. If the claims are once again rejected, Applicant respectfully requests that the Examiner show the relationship between such disclosure in Trans and the claimed limitations. As per **Claim 14**, Trans does not disclose a connection for bridging a security module between a socket for external connection, and the local network, as claimed. Trans Para. [0100], lines 17-18, relied on by the Examiner, mentions unique security feature of a personalized electronic signature, but does not even mention a connection for bridging a security module between a socket for external connection, and the local network, as claimed. If the claims are once again rejected, Applicant respectfully requests that the Examiner show the relationship between such disclosure in Trans and the claimed limitations. As far as a RJ45 jack, Trans (Para. [0200], line 12, relied on by the Examiner) mentions that a RJ45 jack is utilized for Ethernet UTP

applications and is an eight-pin connector. However, this is not a socket on a network interface backplane, as required by **Claim 15**.

It is well settled that in order for a modification or combination of the prior art to be valid, the prior art itself must suggest the modification or combination, "...invention cannot be found obvious unless there was some **explicit** teaching or suggestion in the art to motivate one of ordinary skill to combine elements so as to create the same invention." *Winner International Royalty Corp. v. Wang*, No. 96-2107, 48 USPQ.2d 1139, 1140 (D.C.D.C. 1998) (emphasis added). "The prior art **must provide** one of ordinary skill in the art the **motivation** to make the proposed molecular modifications needed to arrive at the claimed compound." *In re Jones*, 958 F.2d 347, 21 USPQ.2d 1941, 1944 (Fed. Cir. 1992) (emphasis added). No motivation or suggestion is provided in the references to combine them as the Examiner does.

Trans is directed to method for increasing bandwidth while enabling improved security for network communications. Trans provides a clock transfer system, a channel measurement and calibration system, an equalization system, a precision sampling system and a security system. This has nothing to do with the problems solved by the present invention as described above.

Movall is directed to an electrical system having a chassis with slots for chassis electrical devices, and a connector board with a board slot for receiving a connector board electrical device. There is no suggestion or motivation in Movall of switches on a backplane for connecting a security module between an socket for external connection, and the local network. Movall simply provides a memory for storing vital product parametric data associated with the at least one chassis slot, the at least one connector board slot, and the respective electrical devices. The stored vital product parametric data can be accessed by the electrical system to check compatibility. Nor is Beard concerned with providing such features as in Claims 13-15, as is Bears is simply concerned a laptop computer with a PC card slot 330 (relied on by the Examiner), for inserting card into a

laptop. A laptop computer with a card slot in Beard, and a network interface backplane for multiple plug-in network devices are unrelated.

Even if the combination is legally justified, the result does not disclose the claimed limitations. The Examiner attempts to modify Movall by Beard and Trans, not based on disclosure or suggestion in the references, but based on Examiner's lacking interpretation of the references in the nature and extent of the disclosures therein. The Examiner is improperly using "hindsight" and the teachings of Applicant's own claimed invention. The Examiner improperly attempts to modify Movall in an attempt to achieve Applicant's claimed invention. For at least these reasons, rejection of Claims 13-15 should be withdrawn.

New Claims

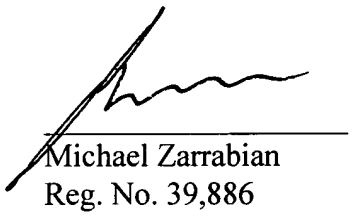
New Claims 35-43 claim further limitations for: the user interface to configure the plug-in devices, using a common communication protocol between the plug-in devices, and ways of obtaining configuration information that are not in the configuration module/circuit of the network interface backplane. These limitations are supported by the specification, and are not disclosed by the references alone or in combination for at least the reasons provided above, and for other reasons. Entry and examination of the new claims are respectfully requested.

CONCLUSION

For the foregoing, and other, reasons Applicants believe that the rejected claims should be allowed. Reconsideration and allowance of the rejected claims are respectfully requested.

Please continue to direct all communications regarding the above-referenced patent application to the principal agent of record.

Respectfully Submitted,



Michael Zarrabian
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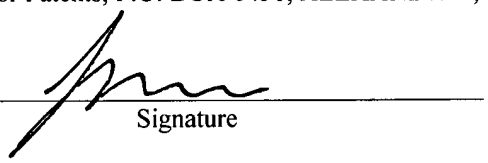
By 
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